MEMO ENDORSED

**U.S. Department of Justice**

*United States Attorney*
*Southern District of New York*

*The Silvio J. Mollo Building*
*One Saint Andrew's Plaza*
*New York, New York 10007*

November 13, 2012

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JUDGE KAPLAN'S CHAMBERS

**BY HAND DELIVERY**

The Honorable Lewis A. Kaplan
United States District Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

**Re: United States v. Lin Wu et al., S1 12 Cr. 707 (LAK)**

Dear Judge Kaplan,

The Government submits this letter to respectfully request a two-week adjournment of time, until December 5, 2012, to produce discovery to defense in this case due to disruptions caused by Hurricane Sandy.

The Court has ordered the Government to produce discovery on a rolling basis, and has set a deadline of November 21, 2012 for the Government's production. The Government has been producing discovery, including audio recordings and hundreds of pages of draft summaries and transcripts for over six months of Title III interceptions, as well as over a thousand pages of Title III and related applications and orders, and this week is producing the bulk of the remaining discoverable documents in the possession of the United States Attorney's Office. However, the investigating agency's offices have been closed until Wednesday, November 7, 2012, by Hurricane Sandy and its aftermath. Additionally, until late last week the case agents have been assigned to various hurricane-related rescue and recovery operations. These disruptions have impaired the Government's ability to organize and produce the discovery in this case.

Accordingly, the Government requests a two-week extension of time, until December 5, 2012, to produce discovery. The defendants' motion deadline is February 14, 2013. No prior requests have been made for the relief requested. After requesting by email on Friday, November 9, 2012, that any objections by defense counsel be made as of 5:00 PM on Monday, November 12, the Government has not received any objections.

Respectfully submitted,

PREET BHARARA
United States Attorney

By: [signature]

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cc: Counsel of Record (via email)

SO ORDERED:

[signature]

THE HONORABLE LEWIS A. KAPLAN
UNITED STATES DISTRICT JUDGE
SOUTHERN DISTRICT OF NEW YORK

11/16/12
Date